

## REMARKS

This is intended as a full and complete response to the Office Action dated January 13, 2005, having a shortened statutory period for response set to expire on April 13, 2005. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, the paragraphs 42-44 have been amended to correct minor editorial problems.

Claims 1-12 are pending in the application. Claims 1 and 3-12 remain pending following entry of this response. Claim 1 has been amended. Claim 2 has been cancelled. New claims 13-17 have been added to recite aspects of the invention. Applicants submit that the amendments and new claims do not introduce new matter.

### Claim Rejections - 35 U.S.C. § 102

Claims 1-4 and 8-12 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Meltzer et al.* US 6,125,391 (hereinafter "*Meltzer*"). Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

In this case, *Meltzer* does not disclose "each and every element as set forth in the claim". Specifically, *Meltzer* does not disclose at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format. The Examiner argues that *Meltzer* discloses at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format in Figure 9. However, the cited figure is in fact directed to building an interface definition (referred to as a business interface definition document or BID document). Col. 30, Lines 31-32. The BID merely describes acceptable formats for incoming requests and for outgoing responses. See Col. 2, Lines 45-48; Col. 10, Lines 34-36. A requesting entity uses the BID to format

documents used when communicating with the BID provider. Col. 2, Lines 43-44. The BID does not contain any information used to describe other, transformed formats. See *id.* Therefore, Applicants submit that claims 1-4 and 8-12 are patentable over *Meltzer*. Withdrawal of the rejection is respectfully requested.

While Applicants believe the original claims to be allowable, in an effort to clarify the claimed invention and to move prosecution forward, claim 1 has been amended. However, since the amendment is not being made to overcome the cited art, Applicants submit the amended claim 1 is entitled to a full range of equivalents.

Further, the Federal Circuit requires that "[t]he identical invention must be shown in as complete detail as is contained in the ... claim" (*Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)) and that the elements must be arranged as required by the claim...(*In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990)).. In this case, Applicants note that Examiner's rejection does not satisfy these requirements of identify of the invention, particularly with respect to the arrangement required by the present claims. For instance, with regards to claim 1, which describes a system for handling eCommerce requests, Examiner has cited Fig. 4, Fig. 9, and Fig. 13 of *Meltzer*. Fig. 4 describes *processing an incoming document* for the system of Fig. 3, which describes a *participant node*. See Col. 26, Lines 18-19; Col. 23, Lines 51-52. Fig. 9 describes the process of *building a business interface definition* using the system of Fig. 7. See Col. 30, Lines 31-32. Fig. 13 describes processes executed at a *market maker node* in the system of Fig. 11. See Col. 83, Lines 29-30. Examiner's rejection does not draw any connections between the three different processes performing the different tasks (with different goals) for the three systems. Indeed, Examiner's rejection, as noted above, merely lists the three different figures without any further explanation. Therefore, Examiner has not shown that the cited elements of the prior art are arranged as required by the pending claims.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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**IN THE DRAWINGS:**

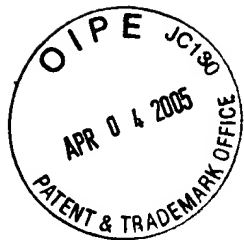
The attached sheet of drawings includes changes to Fig. 3. Fig. 3 has been changed to renumber item 308 as item 404.

**Attachment: Replacement Sheet**  
**Annotated Sheet Showing Changes**

ATTY DKT. NO.: IBM2K0304  
 U.S. SERIAL NO.: 09/837,041  
 FILED: APRIL 18, 2001  
 TITLE: PROCESS FOR DATA DRIVEN APPLICATION INTEGRATION FOR B2B  
 INVENTOR(S): O'BRIEN ET AL.

CONF. NO.: 9205

3/16



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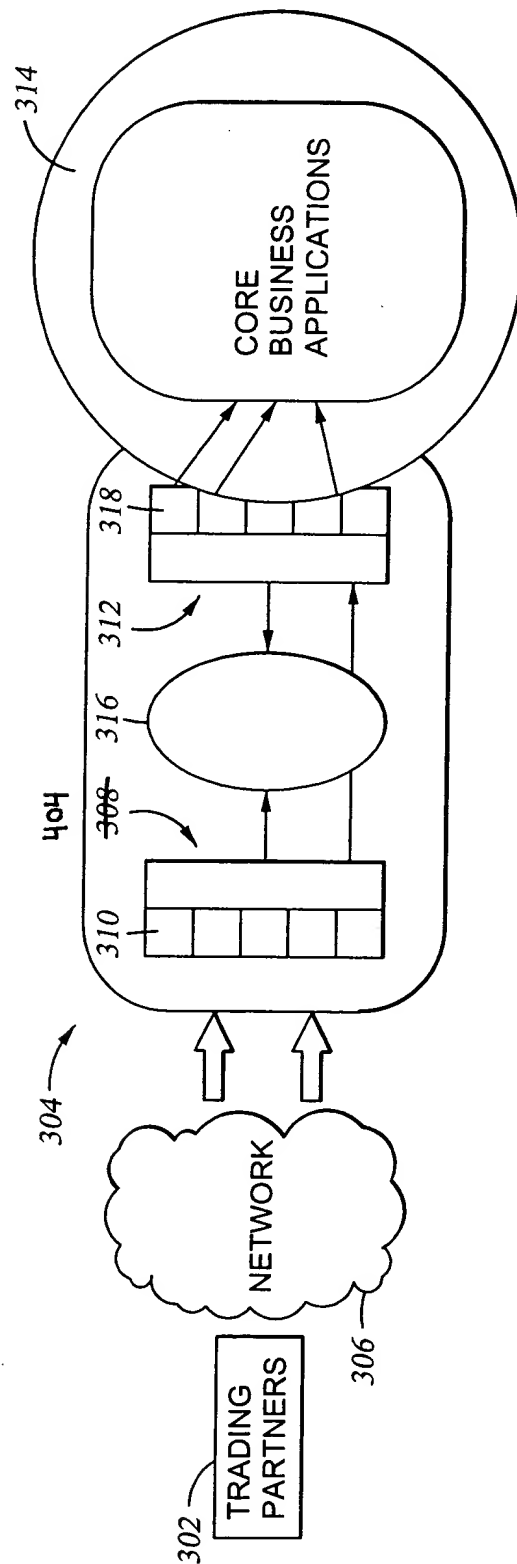


Fig. 3